

Disclosure of numeric grades on qualifying exams does little to help a consumer evaluate the competence of a particular advisor. Is someone with an 86% on their exam better qualified than someone with an 82%? When does the difference become significant? What happens when a score standard is raised on an exam and someone who passed the exam in a previous year with a low qualifying score is reported with a numeric score that is less than the current passing score? If the minimum passing score is not good enough, why is it the minimum? I recommend that a record of Pass/Fails on exams with dates would be a less confusing record of examination performance.

Disclosing reason for termination on Broker check provides employers with an additional weapon with which to threaten advisors should they so choose. I would envision some difficult conversations threatening a public pillorying of departing employees, this threat used perhaps to buy silence ultimately detrimental to the investing public. If we decide to go forward with such disclosure we must clearly explain the meaning and customary use of the terms used and provide the departed employee with a prominent space in which to respond. I am uncomfortable with the privacy issues inherent in this type of disclosure and am not convinced that they help an investor evaluate an advisor.

Broker check should clearly indicate an advisors qualifications, work history, and history of infractions. Muddying the waters with marginally relevant information does little to help the investor make an informed decision.

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